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UNITED STATES OF AMERICA

DEPARTMENT OF ENERGY

OFFICE OF FOSSIL ENERGY AND CARBON MANAGEMENT

In the Matter of:

**Sabine Pass Liquefaction, LLC
and Sabine Pass Liquefaction Stage V, LLC**

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Docket No. 24-27- LNG

**AMENDMENT TO PENDING APPLICATION
FOR AUTHORIZATION TO EXPORT LIQUEFIED NATURAL GAS
TO NON-FREE TRADE AGREEMENT NATIONS
AND REQUEST FOR AMENDED AUTHORIZATION
FOR EXPORTS TO FREE TRADE AGREEMENT NATIONS**

Florian Pintgen, Vice President, Commercial Operations
Karri Mahmoud, Director, Environmental & Regulatory Projects
Cheniere Energy, Inc.
845 Texas Avenue, Suite 1500
Houston, TX 77002
(713) 375-5000
Email: Florian.Pintgen@cheniere.com
Email: Karri.Mahmoud@cheniere.com

J. Patrick Nevins
Latham & Watkins LLP
555 Eleventh Street, N.W.
Suite 1000
Washington, D.C. 20004
(202) 637-3363
patrick.nevins@lw.com

Harold W. Bulger III
Senior Counsel
Cheniere Energy, Inc.
601 Pennsylvania Ave. NW
Suite 1000, North Building
Washington, DC 20004
(202) 442-3073
Harold.Bulger@cheniere.com

Filed: June 6, 2025

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Pursuant to Section 3 of the Natural Gas Act (“NGA”) ¹ and Part 590 of the regulations of the Department of Energy (“DOE”), ² Sabine Pass Liquefaction, LLC and Sabine Pass Liquefaction Stage V, LLC (together “Sabine Pass”) hereby submit for filing with the Office of Fossil Energy and Carbon Management of the DOE (“DOE/FECM”) this amendment (“Amendment”) to their application filed in the above-captioned proceeding on March 1, 2024 (“2024 Application”). In the 2024 Application, Sabine Pass requested multi-contract authority for contracts of all durations to export additional domestically produced liquefied natural gas (“LNG”) from the existing Sabine Pass liquefied natural gas (“LNG”) facility on the Sabine-Neches

¹ 15 U.S.C. § 717b (2018). The authority to regulate the imports and exports of natural gas, including liquefied natural gas, under section 3 of the NGA has been delegated to the Assistant Secretary for Fossil Energy and Carbon Management in Redelegation Order No. S4-DEL-FE1-2022, issued on June 13, 2022.

² 10 C.F.R. § 590 (2025).

Waterway (“SNWW”) in Cameron Parish, Louisiana (“SPLNG Terminal”) in connection with the proposed Sabine Pass Stage 5 Expansion Project (“Stage 5 Project” or “Project”).

On June 6, 2025, Sabine Pass filed with the Federal Energy Regulatory Commission (“FERC”) an amendment to its application for the siting, construction, and operation of the Stage 5 Project pending in FERC Docket No. CP24-75 presenting changes to the proposed Project facilities.³ This Amendment similarly modifies the 2024 Application pending before DOE/FECM in this proceeding to reflect the redesigned Project facilities as now proposed to FERC. Of particular relevance for the requested authorization to export LNG, the Stage 5 Project facilities as now designed will increase the maximum LNG production capacity of the SPLNG Terminal, at peak operations under optimal conditions, by the equivalent of 950.0 billion cubic feet per year (“Bcf/yr”) of natural gas,⁴ resulting in a total LNG production capacity of 2,611.94 Bcf/yr.⁵ In contrast, in its 2024 Application, Sabine Pass had instead requested export authorization based on the prior design of the Stage 5 Project for the equivalent of an incremental 899.46 Bcf/yr of LNG.⁶

In its 2024 Application, Sabine Pass requested an increase in the authorized amount of LNG exports from the SPLNG Terminal by that amount to any country which has, or in the future develops, the capacity to import LNG via ocean-going carriers and with which the U.S. either (1) has a Free Trade Agreement requiring national treatment for trade in natural gas (“FTA” countries)

³ The Secretary of DOE has delegated to FERC the authority to approve or disapprove the construction and operation of natural gas import and export facilities and the site at which such facilities shall be located. The most recent such delegation is DOE Delegation Order No. 00-044.00A, effective May 16, 2006.

⁴ Approximate equivalent of 19 million tonnes per annum (“MTPA”) of LNG.

⁵ This total production capacity of the SPLNG Terminal, after the addition of the Stage 5 Project, is equivalent to approximately 52.04 MTPA of LNG. Prior to the filing of the 2024 Application, DOE previously issued to Sabine Pass long-term, multi-contract authority to export domestic LNG from the SPLNG Terminal in a volume equivalent, in total, to 1661.94 Bcf/yr to both FTA and non-FTA nations. The series of orders in which DOE authorized these long-term, multi-contract exports of domestic LNG from the SPLNG Terminal are listed in Appendix A of the 2024 Application.

⁶ Approximate equivalent of 17.76 MTPA.

or (2) does not have such a FTA but with which trade is not prohibited by U.S. law or policy (“non-FTA” countries). The DOE/FECM granted that request with respect to exports to FTA countries in its Order No. 5181 issued in this proceeding on October 17, 2024.⁷ Accordingly, Sabine Pass now requests that DOE/FECM issue an order amending Order No. 5181 to reflect the currently proposed Stage 5 Project facilities and to increase the authorized volume of exports to FTA countries by an additional 50.54 Bcf/yr so as to reflect the full peak output of the Stage 5 Project of 950.0 Bcf/yr, with no other change in that authorization. Because the portion of the 2024 Application related to exports to non-FTA countries remains pending for future action by DOE/FECM, Sabine Pass hereby amends its application to similarly reflect the modified Stage 5 Project facilities and to increase the requested level of authorized exports to non-FTA nations by that same increment, as well as to extend the requested term of the non-FTA authorization as explained below.

In support of this Amendment of its 2024 Application, Sabine Pass respectfully states the following:

I. INTRODUCTORY ELEMENTS OF THE 2024 APPLICATION

The following two sections of the 2024 Application remain accurate without change and are equally applicable to this Amendment, which does not affect them:

Section I “Description of Applicants” and

Section II “Correspondence and Communications.”

Section III of the 2024 Application, its Executive Summary, also remains accurate except that (as noted above and further explained in Section II below), the Stage 5 Project now includes

⁷ *Sabine Pass Liquefaction, LLC, et al.*, DOE/FECM Order No. 5181, Docket No. 24-278-LNG, Order Granting Long-Term Authorization To Export Liquefied Natural Gas To Free Trade Agreement Nations (Oct. 17, 2024).

the addition to the existing SPLNG Terminal of three new liquefaction trains, plus a new boil off gas (“BOG”) re-liquefaction unit, that will increase the Terminal’s aggregate nominal LNG production capacity by an additional 950.0 Bcf/yr.⁸ In addition, as a minor update to the Executive Summary, the SPLNG Terminal now has reliably and safely produced and exported over 2,900 LNG cargoes since 2016.

Section IV of the 2024 Application, “Existing Long-Term Export Authorizations,” is amended only to reflect the additional quantity of exports to FTA countries authorized in DOE/FECM Order No. 5181 issued in this proceeding. Thus, Sabine Pass currently has long-term, multi-contract authority to export domestic LNG from the SPLNG Terminal in a volume equivalent, in total, to 1661.94 Bcf/yr to non-FTA nations (as stated in the 2024 Application) but of up 2,561.40 Bcf/yr to FTA nations (including the additional volumes authorized in DOE/FECM Order No. 5181). Correspondingly, the listing of orders in which DOE has authorized long-term, multi-contract exports of domestic LNG from the SPLNG Terminal to FTA countries set forth in Table 1 in Appendix A of the 2024 Application should be updated to include Order No. 5181.⁹

⁸ In contrast, in the 2024 Application, Sabine Pass had proposed to construct two larger liquefaction trains, plus a BOG re-liquefier, with total peak production capacity of the equivalent of an incremental 899.46 Bcf/yr of LNG (or approximately 17.76 MTPA).

⁹ As explained in the 2024 Application at 8-9, because all the liquefaction trains at SPLNG Terminal share common infrastructure and are operated as a single integrated facility, DOE/FECM has held that any of Sabine Pass’ long-term export authorizations may be utilized in conjunction with any of Sabine Pass’ long-term contracts associated with LNG exports or gas supply required to be filed with DOE pursuant to the authorizations, as long as the volume and term of the contract are consistent with the authorizations. See DOE/FE Order No. 4520-B, *et al.*, in multiple dockets (Feb. 26, 2021) (granting request for contract consolidation).

II. REVISED DESCRIPTION OF THE STAGE 5 PROJECT

Sabine Pass filed its application with FERC for the siting, construction and operation of the Phase 5 Project in Docket No. CP24-75 on February 29, 2024 (the day before the submission of the 2024 Application to DOE/FECM). That FERC application also included a related natural gas pipeline project proposed by Sabine Pass' affiliate, Sabine Crossing, LLC ("Sabine Crossing"). On March 13, 2024, however, Sabine Crossing submitted to FERC a filing to voluntarily withdraw its portion of the joint application, explaining that it had identified a potential optimization of its proposal and improvement of the pipeline route to be further developed through the resumption of activity in the FERC "Pre-filing" process.¹⁰ That FERC filing stated that Sabine Pass also would continue to consider potential refinements and improvements in its own proposed expansion.¹¹

During that renewed FERC Pre-filing process, Sabine Crossing redesigned its proposed project and now proposes to construct a new 48-inch diameter natural gas pipeline extending approximately 55.6 miles from Liberty County in southeast Texas, through Jefferson County, Texas, then under the SNWW, and into the SPLNG Terminal. The new Sabine Crossing pipeline and related facilities will transport up to approximately 2.7 Bcf per day ("Bcf/d") of natural gas to the SPLNG Terminal from interconnections with existing interstate and intrastate pipelines in Texas that will provide access to abundant and growing natural gas supplies. In addition, in December 2024, Cheniere Creole Trail Pipeline, L.P. ("CTPL"), an existing interstate pipeline connected to the SPLNG Terminal and another subsidiary of Cheniere Energy, Inc. ("Cheniere"), entered into that same FERC Pre-filing process to add a proposed expansion of its system to the

¹⁰ See Sabine Crossing, LLC: Withdrawal of Section 7(c) Certificate Application, filed with FERC on March 13, 2024, in its Docket Nos. PF23-2 and CP24-74 (Accession No. 20240313-5213 in FERC's e-Library).

¹¹ *Id.*

overall Stage 5 Project.¹² The proposed CTPL Expansion facilities will include new compression at both CTPL's existing compressor station in Beauregard Parish, Louisiana and a new station to be located in Cameron Parish, Louisiana, and related facilities, and will provide approximately 0.9 Bcf/d of incremental firm transportation capacity to the SPLNG Terminal from CTPL's existing receipt points, providing access to growing supplies from the Haynesville Shale and other regions delivering to the Gillis Hub area.

Sabine Pass has entered into binding precedent agreements with both Sabine Crossing and CTPL for all of the firm transportation capacity of their pipeline projects for purposes of transporting feed gas for the Stage 5 Project, as well as potentially for other supply needs of the SPLNG Terminal.¹³ Capacity on these new pipelines will provide Sabine Pass with access to a wide variety of sources of abundant domestic natural gas.¹⁴

As the related pipeline projects were being further developed, Sabine Pass also further optimized the design of the SPLNG Terminal Expansion component of the Stage 5 Project. Accordingly, Sabine Pass, in a joint submission with Sabine Crossing and CTPL, filed with FERC on June 6, 2025 an amendment to its NGA Section 3 application for the siting, construction, and operation of the Stage 5 Project, as well as for NGA Section 7 certificates for the related pipeline

¹² See Notification of Additional Applicant and Facilities to Pre-filing, filed with FERC on Dec. 19, 2024 in its Docket No. PF23-2 (Accession No. 20241219-5374).

¹³ Sabine Pass Liquefaction Stage V, LLC is the actual party to the precedent agreements for the new pipeline transportation service.

¹⁴ As explained in the 2024 Application at 11, the particular natural gas supplies that will be exported pursuant to the requested authorizations cannot be known at this time and undoubtedly will change over time and the Stage 5 Project by design is not dependent upon any particular natural gas supply. Sabine Pass currently has the ability to access natural gas from every supply source in the continental U.S. as well as Canada and works with dozens of natural gas producers and infrastructure companies to purchase natural gas supply and reliably transport the supply to the terminal through the integrated pipeline grid. In the same way, feed gas supplies for the Stage 5 Project could be produced from any of a wide variety of production areas. The feed gas will be sourced in requisite volumes in the spot market or purchased under long-term arrangements (which will be filed with DOE/FECM in accordance with the terms of Sabine Pass' authorizations).

projects. All of the proposed Stage 5 Project facilities are described in detail in that joint FERC application.

As further detailed there, the proposed Stage 5 Project Terminal facilities will include the addition of three natural gas liquefaction trains each with a maximum LNG production capacity of approximately 300 billion Bcf/yr¹⁵ using ConocoPhillips liquefaction technology and one BOG re-liquefaction unit with maximum re-liquefaction capacity of approximately 50.0 Bcf/yr.¹⁶ The proposed Stage 5 Project Terminal facilities will be interconnected and operated on an integrated basis with the existing SPLNG Terminal, including tie-ins to the existing LNG storage tanks and ship-loading marine facilities. Thus, the proposed new liquefaction Trains 7, 8, and 9 (which are similar to the existing trains at the SPL Terminal with design and operational refinements to maximize peak output), together with the new BOG re-liquefaction unit, will increase the total LNG production capacity of the SPLNG Terminal, at peak operations under optimal conditions, by a maximum of 950.0 Bcf/yr of natural gas,¹⁷ resulting in total LNG production capacity of the SPLNG Terminal after the addition of the Project of 2,611.94 Bcf/yr.¹⁸

Sabine Pass estimates that it will spend approximately \$15 billion on the proposed SPLNG Terminal Expansion, with about \$11.5 billion expected to be spent in Louisiana, Texas, and across the United States. Sabine Pass intends to construct the Project in two Phases, as detailed in the FERC amendment application. Phase 1 of the Stage 5 Project will include liquefaction Train 7, the BOG re-liquefaction unit, and supporting infrastructure. In Phase 2, Sabine Pass will add Trains 8 and 9 and other related infrastructure, including proposed facilities to allow the loading

¹⁵ Approximate equivalent of 6.0 MTPA of LNG per train.

¹⁶ Approximate re-liquefaction capacity of 1.0 MTPA of LNG.

¹⁷ Approximate equivalent of 19 MTPA of LNG.

¹⁸ Approximate equivalent of 52.04 MTPA of LNG.

of LNG onto LNG carriers (“LNGCs”) simultaneously at any two of the three existing marine berths, facilitating an increase in the maximum marine vessels calling at the SPLNG Terminal. The Project will result in an increase in the maximum marine vessels traffic from the currently authorized 580 LNGCs per year up to 740 LNGCs per year: an increase for which the waterway has already been found to be suitable by the U.S. Coast Guard (“USCG”).¹⁹

Sabine Pass has requested in its amended FERC application that FERC authorize the Stage 5 Project by September 2026. Assuming such FERC authorization timing, Sabine Pass plans to commence construction of Phase 1 of the Project in late 2026, which will allow first exports of incremental LNG volumes as soon as 2030. Construction of Phase 1 of the SPLNG Terminal Expansion will take approximately four-and-a-half years until Train 7 is placed in-service. If Phase 2 follows immediately after Phase 1, as currently anticipated, construction of the entire SPLNG Terminal Expansion will take approximately six to seven years. All or a portion of the Project’s second phase, however, may be delayed depending on market conditions when Sabine Pass must make a positive final investment decision on some or all of Phase 2, complexities associated with sequencing and phasing a project of this scale, and the needs of Sabine Pass’ customers. Therefore, the completion of the entirety of this large and phased Project may take longer than estimated. Accordingly, Sabine Pass has requested, in its amended FERC application that FERC allow, in any condition imposed on its authorization of the Project, ten (10) years from the date of the FERC authorization order to place all of the Project facilities in-service, which will allow for potential, reasonable delays in the planned schedule.

¹⁹ On April 17, 2024, the USCG issued the Letter of Recommendation (“LOR”) confirming the suitability as it relates to safety and security of the SNWW for the increased LNG marine traffic of an additional 160 LNGC calls per year. That is, based upon a comprehensive review of a follow-on Waterway Suitability Assessment (“WSA”) and after consultation with state and local port stakeholders, the USCG recommended that the SNWW be considered suitable for accommodating the type and frequency of increased LNG marine traffic associated with this Project.

III. AUTHORIZATIONS REQUESTED

In its 2024 Application, Sabine Pass requested the issuance of separate orders authorizing the requested LNG exports to FTA nations and non-FTA nations, consistent with established DOE/FECM procedures as well as the statutory requirement of NGA Section 3(c) to grant requests to export natural gas to FTA countries without delay.²⁰ In accordance with that request, DOE/FECM has previously acted on the FTA portion of the 2024 Application (albeit more than seven months after it was filed) in its Order No. 5181. On the other hand, the portion of the 2024 Application concerning exports to non-FTA countries remains pending for future action in this proceeding. Accordingly, as further described below, in light of the changes in the Stage 5 Project as proposed to FERC, Sabine Pass requests that DOE/FECM amend its prior authorization for related exports to FTA countries issued in Order No. 5181 and consider this amendment to its prior request in this proceeding with respect to non-FTA exports.

A. EXPORT TO FREE-TRADE NATIONS

Section 3(c) of the NGA, as amended by Section 201 of the Energy Policy Act of 1992 (Pub. L. 102-486), requires that applications to authorize exports of natural gas, including LNG, to a nation with which there is in effect a free trade agreement requiring national treatment for trade of natural gas be “deemed to be consistent with the public interest” and “granted without modification or delay.”²¹ In addition, DOE/FECM has held that the otherwise applicable

²⁰ 15 U.S.C. § 717b(c) (2018).

²¹ *Id.* (“For purposes of [15 U.S.C. § 717b(a)] of this section, the importation of the natural gas referred to in [15 U.S.C. § 717b(b)] of this section, or the exportation of natural gas to a nation with which there is in effect a free trade agreement requiring national treatment for trade in natural gas, shall be deemed to be consistent with the public interest, and applications for such importation or exportation shall be granted without modification or delay.”).

regulatory requirements for public notice and other procedures set forth in 10 C.F.R. Part 590 do not apply to exports to FTA nations.²²

In Order No. 5181, DOE/FECM granted the authorization for exports to FTA nations as requested in the 2024 Application. The order authorized incremental FTA exports from the SPLNG terminal of 899.46 Bcf/yr for a term of twenty-five (25) years commencing on the date of first commercial export from the Stage 5 Project, pursuant to one or more contracts of any duration. As requested, the order authorizes Sabine Pass to export the LNG both on its own behalf and as agent for other entities with which it may contract that may hold title to the LNG at the time of export from the SPLNG Terminal. Order No. 5181 also includes other terms and conditions typical of export authorizations.

Order No. 5181 in its Background Section includes a description of the Stage 5 Project, as well as of the Sabine Crossing Pipeline, both as previously proposed in the 2024 Application, and also refers in Ordering Paragraph A to exports from “Trains 7 and 8” (based on the prior Project design of just two, larger liquefaction trains). As explained above, the Stage 5 Project has been redesigned and now includes three liquefaction trains. Accordingly, Sabine Pass requests that DOE/FECM issue an order amending Order No. 5181 to reflect the currently proposed Stage 5 Project facilities.

As explained above, the currently proposed Stage 5 Project facilities will increase the total LNG production capacity of the SPLNG Terminal, at peak operations under optimal conditions, by a maximum of 950.0 Bcf/yr of natural gas,²³ which is 50.54 Bcf/yr more than was authorized for the Project in Order No. 5181. Therefore, the requested amendment to that Order should

²² E.g., DOE/FECM Order No. 5181 at p. 20, note 48; *Corpus Christi Liquefaction, LLC, et al.*, DOE/FE Order No. 5019, Docket No. 23-46-LNG, at p. 7, note 31 (July 19, 2023); *Sabine Pass Liquefaction, LLC*, DOE/FE Order No. 4520 at p. 7, note 31 (Apr. 14, 2020).

²³ Approximate equivalent of 19 MTPA of LNG.

increase by that additional increment of 50.54 Bcf/yr the authorization for export of LNG to FTA nations (including any additional nation which DOE publicly identifies in the future as having entered into an FTA providing for national treatment for trade in natural gas or otherwise being is treated as, or equivalent to, an FTA nation by the U.S.). No other changes to the FTA authorization for the Stage 5 Project are requested or needed. In accordance with NGA Section 3(c), Sabine Pass respectfully requests that DOE/FECM grant this requested amendment to its FTA export authorization for the Stage 5 Project without modification or delay.

B. EXPORT TO NON-FREE-TRADE NATIONS

Sabine Pass hereby amends the non-FTA portion of its 2024 Application to reflect the currently proposed Stage 5 Project facilities as described above, including the incremental LNG production capacity of those facilities at peak operations under optimal conditions of a maximum of 950.0 Bcf/yr of natural gas. Accordingly, Sabine Pass now requests that the authorized volume of exports from the SPLNG Terminal to non-FTA nations be increased by that amount. The only other change in the non-FTA authorization as requested in the 2024 Application relates to the term of the authorization.

In the 2024 Application, Sabine Pass requested a term for its non-FTA export authorization extending through the later of (i) the end of 2050 (the standard end point in existing export authorizations²⁴) or (ii) twenty (20) years after the commencement of commercial exports under

²⁴ Effective August 25, 2020, DOE discontinued its prior practice of granting a standard 20-year export term for long-term authorizations to export domestically produced natural gas from the lower-48 states to non-FTA nations and instead adopted a longer term through December 31, 2050, as the standard export term for long-term non-FTA authorizations, unless a shorter term is requested by the applicant. “Extending Natural Gas Export Authorizations to Non-Free Trade Agreement Countries Through the Year 2050,” Notice of Final Policy Statement and Response to Comments, 85 Fed. Reg. 52237 (Aug. 25, 2020) (hereinafter “Term Extension Policy Statement”). The adoption of a longer-term for export authorizations in the 2020 Term Extension Policy Statement was based at least in part on the comments filed by Cheniere. *See* Cheniere Energy, Inc., Comments on the 2018 LNG Export Study (July 27, 2018), discussed in DOE/FE, Notice of Proposed Policy Statement and Request for Comments, 85 Fed. Reg. 7674 at 7679 *et seq.* (Feb. 11, 2020).

the requested authorization. Sabine Pass explained therein that exports from the Stage 5 Project might not commence until the early years of the 2030s, and that a term of less than 20-years would be contrary to DOE’s reasoning in the Term Extension Policy Statement, would put Sabine Pass at a commercial disadvantage vis-a-vis LNG producers elsewhere in the world, would be inconsistent with the economic life of the new Stage 5 Project facilities, and could present financing challenges.²⁵

First commercial exports from the Stage 5 Project are estimated to commence in 2030 or later, however, Sabine Pass now proposes to phase construction of the Project with three new trains added sequentially, likely over a multi-year period. Therefore, a term for the export authorization ending in 2050, and also a 20-year term commencing from the initial commencement of exports from Train 7, would both result in a term of less than 20 years for exports sourced from later constructed Trains 8 and 9. To address this issue, Sabine Pass now amends the 2024 Application to request instead a term of twenty-five (25) years from the first commercial exports from the Phase 5 Project for non-FTA exports, just as for FTA exports.

When DOE authorized non-FTA export terms extending through the end of 2050 in its Term Extension Policy Statement, it explained its reasoning for adopting a *30 year term* as follows:

a 30-year export term would better match the operational life of LNG export facilities, which are typically designed for a service life of 30 to 50 years. A 30-year export term thus would provide authorization holders with greater security in financing their export facility and would maximize their ability to enter into natural gas supply and export contracts for a longer period of time... and a 30-year export term would benefit U.S. authorization holders as they compete for long-term export contracts in the global market.²⁶

²⁵ See 2024 Application at 13-15.

²⁶ Term Extension Policy Statement, 85 Fed. Reg. 52237 at 52240 (Aug. 25, 2020).

DOE also concluded that the longer term it adopted “will provide important commercial benefits to existing and future authorization holders in the lower-48 states, while enhancing long-term regulatory certainty for both authorization holders and foreign buyers of U.S. LNG.”²⁷ These same considerations support Sabine Pass’ request here for a 25-year term for its non-FTA authorization. So too does the Trump Administration’s commitment to the development of new energy resources, to eliminate undue regulatory burdens, and to expedite energy infrastructure permitting,²⁸ as well as DOE’s own specific focus on unleashing LNG exports.²⁹

Current DOE policies, of course, support not only the requested 25-year term duration but also recognition that LNG exports as proposed here are fully consistent with the public interest.³⁰ Sabine Pass explained at length in its 2024 Application that granting Sabine Pass its requested authorization to export LNG will be consistent with, and indeed advance, the public interest, explaining *inter alia* that: domestic gas supplies are ample for both LNG exports and domestic needs;³¹ the Stage 5 Project will provide macro-economic benefits;³² LNG exports provide

²⁷ *Id.* at 52241.

²⁸ *See, e.g., Declaring a National Energy Emergency*, Exec. Order No. 14,156, 90 Fed. Reg. 8433 (Jan. 20, 2025); *Unleashing American Energy*, Exec. Order No. 14,154, 90 Fed. Reg. 8353 (Jan. 20, 2025).

²⁹ *See* DOE Press Release, “DOE FINALIZES 2024 LNG EXPORT STUDY, PAVING WAY FOR STRONGER AMERICAN ENERGY EXPORTS,” May 19, 2025, (“President Trump was given a mandate to unleash American energy dominance, and that includes U.S. LNG exports,” U.S. Energy Secretary Chris Wright said.), available at: <https://www.energy.gov/articles/doe-finalizes-2024-lng-export-study-paving-way-stronger-american-energy-exports>. *See also, e.g.,* DOE Press Release, “Secretary Wright Highlights 100 Days of Unleashing American Energy Under President Trump,” Apr. 29, 2025 (noting a series of orders supporting LNG exports), available at: <https://www.energy.gov/articles/secretary-wright-highlights-100-days-unleashing-american-energy-under-president-trump>).

³⁰ NGA Section 3(c), which governs orders authorizing non-FTA exports, provides that DOE “*shall issue* such order upon application, *unless*, after opportunity for hearing, [the Secretary] finds that the proposed exportation or importation will not be consistent with the public interest.” 15 U.S.C. § 717b(a) (2006) (emphasis added). This statutory language creates a presumption that the proposed export of natural gas is in the public interest and, accordingly, DOE has consistently held that it must grant export applications unless opponents of an application overcome this presumption by making an affirmative demonstration that the proposed export is inconsistent with the public interest. *See, e.g., Sierra Club v. U.S. Dep’t of Energy*, 867 F.3d 189 at 203 (D.C. Cir. 2017).

³¹ 2024 Application at 26-31.

³² *Id.* at 31-34.

geopolitical benefits;³³ and LNG exports provide environmental benefits.³⁴ Those explanations, of course, remain fully applicable.

At the time of the 2024 Application, DOE had just recently announced its “pause” on new non-FTA export authorizations in connection with its planned update of its previous studies used to inform its determinations whether requests for non-FTA LNG export authorization are consistent with the public interest. While noting that development, Sabine Pass detailed the prior studies of LNG exports conducted by DOE that were uniformly supportive of the public interest in LNG exports.³⁵ On December 17, 2024, DOE/FECM gave notice of availability of the 2024 LNG Export Study.³⁶ Cheniere submitted comments on the 2024 LNG Export Study on March 20, 2025, and Sabine Pass expressly requests that DOE/FECM take those Cheniere Comments into consideration in acting on its Application here.³⁷

In announcing DOE’s Response to Comments regarding the 2024 Export Study Energy on May 19, 2025, Secretary Wright said: “The facts are clear: expanding America’s LNG exports is good for Americans and good for the world.”³⁸ Principal Deputy Assistant Secretary of DOE/FECM Tala Goudarzi added that “[t]he 2024 Study confirms what our nation always knew—

³³ *Id.* at 34-38.

³⁴ *Id.* at 38-45.

³⁵ *See id.* at 4 & n. 9 (noting DOE’s Jan. 26, 2024 announcement of its new study) and 22-26 (discussing prior DOE studies).

³⁶ Notice of Availability of the 2024 LNG Export Study: Energy, Economic, and Environmental Assessment of U.S. LNG Exports and Request for Comments, 89 Fed. Reg. 104,132 (Dec. 20, 2024).

³⁷ Cheniere’s Comments on the 2024 LNG Export Study are available as comment identification number 7991 on DOE’s webpage for such comments available at: <https://fossil.energy.gov/app/docketindex/docket/index/30>. According to the Notice of Availability of the 2024 LNG Export Study, all comments submitted in compliance with the applicable procedures were placed in the administrative record for various pending proceedings, including this one.

³⁸ DOE Press Release, “DOE FINALIZES 2024 LNG EXPORT STUDY, PAVING WAY FOR STRONGER AMERICAN ENERGY EXPORTS,” May 19, 2025, note 29 *supra*.

LNG supports our economy, strengthens our allies, and enhances national security.”³⁹ In the Response to Comments itself, DOE/FECM upon its consideration of the 2024 Study and the comments on it made the following Key Findings:

- “1. U.S domestic natural gas supply is sufficient to meet domestic and market-based global demand for U.S. natural gas (including LNG).
2. Increasing U.S. LNG exports increases U.S. GDP.
3. Higher levels of U.S. LNG exports will have a beneficial impact on the U.S. trade balance.
4. Increased LNG exports are projected to have relatively modest impacts on prices and there has not been a consistent effect of U.S. LNG exports on prices to date. The potential price impacts from increased LNG exports modeled in the 2024 Study are within the range of prices observed over the past five years, and those price impacts are below the price increases from U.S. LNG exports modeled in DOE’s 2018 LNG Export Study.
5. Increased U.S. LNG exports would enhance national and energy security for the United States, as well as U.S. allies and trading partners.
6. If U.S. LNG exports more than triple from current levels and reach the model-resolved level of exports, 56.3 Bcf/d, the cumulative increase in global GHG emissions to 2050 would be no greater than 0.1%. Given the uncertainties inherent in modeling the global energy system, DOE cannot conclude that the change in GHG emissions would be significantly different from zero.
7. Increased U.S. exports of LNG are more likely to displace other sources of natural gas, along with coal and oil, than to replace renewable energy.
8. Natural gas production and the development of natural gas export infrastructure provide economic support to the communities in which they occur, including increased levels of employment.
9. Natural gas production, processing, and transportation have environmental effects. Federal, state, and local regulatory requirements, that are outside DOE’s authority over LNG exports,

³⁹ *Id.*

include measures to reduce or mitigate any potential related impacts.”⁴⁰

Stating DOE/FECM’s conclusion most generally, it found that “the record evidence from 2024 LNG Export Study and the public comments received support the proposition that exports of LNG from the United States will not be inconsistent with the public interest.”⁴¹

For all of these reasons, as well as those detailed in the 2024 Application, granting Sabine Pass its requested authorization to export LNG to non-FTA nations will be consistent with, and indeed advance, the public interest.

IV. CONCLUSION

WHEREFORE, for all the foregoing reasons, Sabine Pass respectfully requests that DOE/FECM (1) amend the authorization for exports of domestically produced LNG issued in Order No. 5181 to reflect the currently proposed Stage 5 Project facilities and to increase the authorized volume of exports to FTA countries by an additional 50.54 Bcf/yr with no other change in that authorization and (2) authorize multi-contract exports of any duration of domestically produced LNG to non-FTA nations of up to the equivalent of a maximum of 950.0 Bcf/yr to reflect the full peak output of the Stage 5 Project for a period of twenty (25) years after the commencement of commercial exports from the Stage 5 Project.

⁴⁰ “Response to Comments for the 2024 LNG Export Study: Energy, Economic, and Environmental Assessment of U.S. LNG Exports,” at 46-47: the availability of this Response was announced at 90 Fed. Reg. 21912 (May 22, 2025) and the Response itself is available at: https://www.energy.gov/sites/default/files/2025-05/2024%20LNG%20Export%20Study_Response%20to%20Comments_Final_05.19.2025.pdf.

⁴¹ *Id.* at 50.

Respectfully submitted,

/s/ J. Patrick Nevins

J. Patrick Nevins
Latham & Watkins LLP
555 Eleventh Street, N.W.
Suite 1000
Washington, D.C. 20004
(202) 637-3363
patrick.nevins@lw.com

Florian Pintgen, Vice President, Commercial Operations
Karri Mahmoud, Director, Environmental & Regulatory Projects
Cheniere Energy, Inc.
845 Texas Avenue, Suite 1500
Houston, TX 77002
(713) 375-5000
Email: Florian.Pintgen@cheniere.com
Email: Karri.Mahmoud@cheniere.com

Harold W. Bulger III
Senior Counsel
Cheniere Energy, Inc.
601 Pennsylvania Ave. NW
Suite 1000, North Building
Washington, DC 20004
(202) 442-3073
Harold.Bulger@cheniere.com

Dated: June 6, 2025

APPENDIX A
VERIFICATION

VERIFICATION

State of Texas)

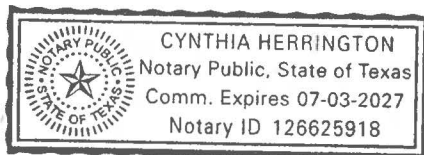
County of Harris)

BEFORE ME, the undersigned authority, on this day personally appeared Florian Pintgen, who, having been by me first duly sworn, on oath says that he is Vice President, Commercial Operations for Cheniere Energy, Inc. and is duly authorized to make this Verification; that he has read the foregoing instrument and that the facts therein stated are true and correct to the best of his knowledge, information, and belief.



Florian Pintgen
Vice President, Commercial Operations

SWORN TO AND SUBSCRIBED before me on the 4th day of June, 2025.



Name: Cynthia Herrington

Title: Executive Assistant

My Commission expires: July 3, 2027

APPENDIX B

OPINION OF COUNSEL



Cheniere Energy, Inc.
845 Texas Avenue, Suite 1250
Houston, Texas 77002
Phone: (713) 375-5000
Fax: (713) 375-6000
Cheniere.com

June 3, 2025

U.S. Department of Energy
Office of Fossil Energy, FE-34
1000 Independence Avenue, S.W. Washington, D.C. 20585

**RE: Sabine Pass Liquefaction, LLC and Sabine Pass Liquefaction Stage V, LLC
FE Docket No. 24-27-LNG
Amendment to Pending Application for Authorization to Export LNG to Non-
Free Trade Agreement Nations and Request for Amended Authorization for
Exports to Free Trade Agreement Nations**

Dear Sir or Madam:

This opinion of counsel is provided in accordance with the requirements of section 590.202(c) of the U.S. Department of Energy's regulations, 10 C.F.R. § 590.202(c) (2019). I have examined the Limited Liability Company Agreement of Sabine Pass Liquefaction, LLC and Sabine Pass Liquefaction Stage V, LLC (collectively, "Sabine Pass") and other authorities as necessary and have concluded that the proposed exportation of liquefied natural gas is within Sabine Pass' corporate powers.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Taylor Johnson", is written over a horizontal line.

By: Taylor Johnson
Senior Vice President and Deputy General Counsel
Cheniere Energy, Inc.
845 Texas Avenue, Suite 1250
Houston, TX 77002
(713) 375-5000